

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

CORPUS CHRISTI DIVISION

United States Courts  
Southern District of Texas  
FILED

DEC 21 2021

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

HAYDEN MICHAEL ESPINOSA

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§  
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§  
§

CRIMINAL NUMBER

**C-21-1079**

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about September 21, 2021 and December 7, 2021, in the Corpus Christi Division of the Southern District of Texas and within the jurisdiction of the Court, the defendant,

HAYDEN MICHAEL ESPINOSA,

did knowingly transfer and possess machine guns to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number ("Glock switches"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun, and 3D printed Trigger Control Group Travel Reducers (TCGTRs) having no manufacturer's marks and no serial number ("AR lightning links"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun, and said machineguns were not registered to defendant HAYDEN MICHAEL ESPINOSA in the National Firearms Registration and Transfer Record.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT TWO

Between on or about September 21, 2021 and December 7, 2021, in the Corpus Christi Division of the Southern District of Texas and within the jurisdiction of the Court, the defendant,

HAYDEN MICHAEL ESPINOSA,

did knowingly possess machine guns to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number ("Glock switches"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun, and 3D printed Trigger Control Group Travel Reducers (TCGTRs) having no manufacturer's marks and no serial number ("AR lightning links"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun. These firearms were required to be registered and were not in fact registered to the defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT THREE

Between on or about September 21, 2021 and December 7, 2021, in the Corpus Christi Division of the Southern District of Texas and within the jurisdiction of the Court, the defendant,

HAYDEN MICHAEL ESPINOSA,

knowingly made firearms, to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number ("Glock switches"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun, and 3D printed Trigger Control Group Travel Reducers (TCGTRs) having no manufacturer's marks and no serial number ("AR lightning links"), parts designed and intended solely and exclusively for use in converting a weapon into a machinegun, in violation of Title 26, United States Code, Section 5845(b), that is, a machine gun. The firearms were made without the approval of the Secretary.

In violation of Title 26 United States Code, Sections 5822, 5861(f), and 5871.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), as a result of the commission of a violation of Title 18, United States Code, Sections 922(o) and 924(a)(2), as alleged in Count One of the Indictment, as well as pursuant to Title 26 United States Code, Section 5872, as a result of the commission of a violation of Title 18, United States Code, Sections 5822, 5861(d), 5861(f), and 5871 as alleged in Counts Two and Three of the Indictment, notice is given that the defendant,

HAYDEN MICHAEL ESPINOSA,

shall forfeit to the United States any firearm(s) used in commission of the offense, including, but not limited to:

1. Eleven (11) 3D printed Trigger Control Group Travel Reducers (TCGTRs) having no manufacturer's marks and no serial number ("AR lightning links"); and
2. four (4) 3D printers.

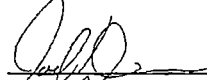
All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section, and 2461(c).

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A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

JENNIFER LOWERY  
ACTING UNITED STATES ATTORNEY

By:

  
JOEL DUNN  
Assistant United States Attorney